

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

CILDREN'S HOSPITAL CORP.,

Plaintiff,

vs.

KINDERCARE LEARNING CENTERS,
INC., BLUE CROSS BLUE SHIELD OF
MASSACHUSETTS, INC., and REGENCE
BLUE CROSS BLUE SHIELD OF OREGON,

Defendants

Civ. A. No. 04-11676-PBS

JOINT MOTION FOR AN EXTENSION OF TIME

The parties jointly move for an extension of the deadlines the Court set in its order of October 7, 2004. The parties further request that the Court extend the deadline for completion of discovery to April 15, 2005, the deadline for submission of summary judgment motions to May 6, 2005, the deadline for oppositions to such motions to May 27, 2005, and the date for a hearing on such motions at a date convenient to the Court.

In support of this motion, the parties state that they have sought to conduct discovery in an efficient manner, and that they have exchanged documents and responded to interrogatories and requests for admissions. The plaintiff, Children's Hospital Corp., has taken the deposition Blue Cross Blue Shield, Inc., of Massachusetts, Inc. (which was suspended, and which the parties have agreed to complete after providing each other with certain information). Children's Hospital also noticed the depositions of the other two defendants and two individuals, all to be taken in Portland, Oregon, but the parties have been unable to find dates convenient for the parties and their attorneys until March 2005. The defendants have noticed the deposition of

Children's Hospital, which the parties have agreed they will take after Children's Hospital takes the Portland depositions.

For the foregoing reasons, the parties respectfully request that the Court enter an order re-setting the deadlines in this case as indicated above.

Respectfully submitted,

CHILDREN'S HOSPITAL CORP.

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BLUE CROSS BLUE SHIELD OF MASSACHUSETTS, INC. and REGENCE BLUE CROSS BLUE SHIELD OF OREGON

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